

Exhibit B

Megan Ix Brison

From: Thomas Urban <urban@fhhlaw.com>
Sent: Thursday, March 30, 2023 3:06 PM
To: Megan Ix Brison; Tony Lee; Seth Williams; Margaret F. England
Cc: Elizabeth Wilburn Joyce
Subject: RE: Discrete v. Intrado - Plaintiffs' Production of Attachments
Attachments: DH000965-DH004461 - Attachments Log.3.30.2023.pdf

Ms. Brison –

1. We hereby provide you with a log identifying which attachment produced on March 29 is associated with its respective email produced on March 15, 2023. We will have to agree to disagree whether this log complies with the applicable rules and the applicable orders in this case. I would note that the parties explicitly agreed at the beginning of this lawsuit that production of PDFs was acceptable and that native documents and metadata were not required. So far, you have not explained why such metadata is specifically required in this situation. Each of these emails is independently in the possession, custody, and control of Intrado, as they are emails between West employees, attorneys, or consultants on one side and Plaintiffs' employees, attorneys, or consultants on the other. Thus, every one of these emails (and its metadata) is independently available to Intrado.
2. We will have to agree to disagree regarding the significance of the Tax Side Letter. Plaintiffs have put that letter at issue in this case and there is a factual issue whether that letter is part of the SPA. That is a crucial factual issue to the determination of any motion for summary judgment that Intrado may file.
3. No one has argued that “Plaintiffs[‘] document requests [should be construed] to broadly seek all documents and communications related to every document in the SPA closing binder.” To the contrary, Plaintiffs merely seek relevant documents regarding the negotiation of the relevant provisions of the SPA that are implicated by Intrado’s indemnification request, including but not limited to, the Tax Side Letter. We do not understand why it is taking Intrado so long to address this issue, other than as an attempt to slow roll the production of documents that undercut Intrado’s claims in this lawsuit. We hope that Intrado will cooperate in the provision of this discovery to avoid involving the Court in this dispute.

Thank you for your attention to these issues,

Tom

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From: Megan Ix Brison <MIxbrison@pwujlaw.com>
Sent: Thursday, March 30, 2023 1:29 PM
To: Thomas Urban <urban@fhhlaw.com>; Tony Lee <lee@fhhlaw.com>; Seth Williams <williams@fhhlaw.com>; Margaret F. England <mengland@gsbblaw.com>
Cc: Elizabeth Wilburn Joyce <EWilburnJoyce@pwujlaw.com>
Subject: RE: Discrete v. Intrado - Plaintiffs' Production of Attachments

Attachment To	File Name	Bates	Range
DH000787	Project Deco - Disclosure Schedules (Final).pdf	DH000965	DH001019
	Project Deco - Sean Hsieh-Develop LLC Consulting Agreement (Executed).pdf	DH001020	DH001028
	Project Deco - Side Letter Agreement re Nexus Study (Executed).pdf	DH001029	DH001034
	Project Deco - Stock Purchase Agreement (Executed).pdf	DH001035	DH001169
DH000792	Project Deco - Side Letter Agreemetn re Nexus Study - 6.22.18.pdf	DH001174	DH001177
	Project Deco - Side Letter Agreemetn re Nexus Study - 6.22.18.pdf	DH001174	DH001177
DH000805	Marked Side Letter Agreement re Nexus Study - 6-27-2018.pdf	DH001178	DH001182
	Side Letter Agreement re Nexus Study - 6-27-18.pdf	DH001183	DH001187
DH000807	Escrow Agreement (Flowroute comments) v2 - 23 June.pdf	DH001188	DH001205
DH000809	Project Deco - Stock Purchase Agreement.pdf	DH001208	DH001290
pdf	DH001291	DH001374
DH000811	Project Deco - Stock Purchase Agreement.pdf	DH001375	DH001457
pdf	DH001458	DH001541
DH000819	Deco -- SPA Ex. C.pdf	DH001542	DH001542
DH000820	DECO Transaction Bonus Schedules for SPA 06.24.2018.pdf	DH001543	DH001543
DH000823	Transaction Bonus Schedules for SPA Final.pdf	DH001544	DH001545
DH000826	Project Deco - Stock Purchase Agreement v3 (Kutak 31 May).pdf	DH001549	DH001629
	Project Deco - Stock Purchase Agreement v3 (Kutak) (redline).pdf	DH001630	DH001712
DH000827	Project Deco - Stock Purchase Agreement v2 (redline).pdf	DH001717	DH001797
	Project Deco - Stock Purchase Agreement v2.pdf	DH001798	DH001876
DH000832	Project Deco - SPA Disclosure Schedules.pdf	DH001885	DH001909
	Redline_4811-2978-5195v2_Project Deco - SPA Disclosure Schedules - 4811-2978-5195v4_Project Deco - SPA Disclosure Schedules.pdf	DH001910	DH001935
	Escrow Agreement (West) v3 - 26 June.pdf	DH001936	DH001953
	June 26 DRAFT SPA Disclosure Schedules - Clean copy.pdf	DH001954	DH002001
	redline).pdf	DH002002	DH002032
	Project Deco - Stock Purchase Agreement v8 (Flowroute 26 June).pdf	DH002033	DH002116
	Deco - SPA Disclosure Schedules.pdf	DH002117	DH002146
	June 27 SPA Disclosure Schedules - Final Draft.pdf	DH002147	DH002177
	June 28 SPA Disclosure Schedules - Final.pdf	DH002178	DH002228
DH000841	Direction To Pay-9-9.docx.pdf	DH002233	DH002235
DH000845	Marked Side Letter Agreement re Nexus Study - 6-27-2018.pdf	DH002240	DH002244

DH000862	Side Letter Agreement re Nexus Study - 6-27-18.pdf Project Deco - Stock Purchase Agreement.pdf 4838....pdf	DH002245 DH002249 DH002256 DH002339 DH002340 DH002423
DH000877	West Project Deco - Form of Non-Competition Agreement.pdf	DH002452 DH002458
DH000878	Redline_4814-2597-9497v3 - 4814-2597-9497v4.pdf	DH002470 DH002477
DH000878-879	West Project Deco - Form of Non-Competition Agreement(1).pdf	DH002478 DH002484
DH000879	West Project Deco - Form of Non-Competition Agreement.pdf Form of Non-Competition Agreement 19 June (redline - Flowroute comments).pdf Redline_4814-2597-9497v2 - 4814-2597-9497v3(1).pdf	DH002496 DH002502 DH002514 DH002520 DH002521 DH002529
DH000880-881	West Project Deco - Form of Non-Competition Agreement.pdf	DH002530 DH002536
DH000881-882	Form of Non-Competition Agreement 19 June (redline - Flowroute comments).pdf Redline_4814-2597-9497v3 - 4814-2597-9497v4.pdf	DH002548 DH002554 DH002566 DH002573
DH000884-885	West Project Deco - Form of Non-Competition Agreement(1).pdf	DH002574 DH002580
DH000886-887	Escrow Agreement (Flowroute comments) v2 - 23 June.pdf Project Deco - Form of Escrow Agreement.pdf Project Deco - Form of Resignation (Exhibit G).pdf Project Deco - Form of Stock Power (Exhibit D).pdf Project Deco - Sean Hsieh-Develop LLC Consulting Agreement.pdf Project Deco - Side Letter Agreement re Nexus Study.pdf Project Deco - Stock Purchase Agreement.pdf Agreement - 4814-5377-9051v4_Project Deco - Sean Hsieh-Develop LLC Consulting Agreement.pdf	DH002597 DH002614 DH002615 DH002631 DH002632 DH002633 DH002634 DH002634 DH002635 DH002643 DH002644 DH002648 DH002649 DH002734
		DH002735 DH002744
	Redline_4818-8626-7241v7_Project Deco - Form of Escrow Agreement - 4818-8626-7241v8_Project Deco - Form of Escrow Agreement.pdf	DH002745 DH002762
	Redline_4836-9469-3740v1_Deco - Side Letter - FOR REDLINING ONLY - 4827-0634-2251v4_Project Deco - Side Letter Agreement re Nexus Study.pdf Revised Draft rec'd from Seller on 6-28 - 4838-8777-3541v14_Project Deco - Stock Purchase Agreement.pdf	DH002763 DH002768
DH000888-889	Project Deco - Disclosure Schedules (Final).pdf Project Deco - Sean Hsieh-Develop LLC Consulting Agreement (Executed).pdf Project Deco - Side Letter Agreement re Nexus Study (Executed).pdf Project Deco - Stock Purchase Agreement (Executed).pdf	DH002769 DH002855 DH002860 DH002914 DH002915 DH002923 DH002924 DH002929 DH002930 DH003064
DH000893-894	Project Deco - Stock Purchase Agreement v3 (Kutak 31 May).pdf	DH003070 DH003150

	Project Deco - Stock Purchase Agreement v3 (Kutak) (redline).pdf	DH003151	DH003233
	Project Deco - Sellers' Certificate Jordan-signed.pdf	DH003252	DH003253
DH000901-902	Project Deco - Stock Purchase Agreement.pdfpdf	DH003254	DH003336
DH000905-906	Project Deco - Stock Purchase Agreement v3 (Kutak 31 May).pdf Project Deco - Stock Purchase Agreement v3 (Kutak) (redline).pdf Project Deco - Stock Purchase Agreement v3 (Kutak 31 May).pdf Project Deco - Stock Purchase Agreement v3 (Kutak) (redline).pdf	DH003337	DH003420
DH000906	Project Deco - Stock Purchase Agreement v4 (6 June - redline).pdf Project Deco - Stock Purchase Agreement v4 (6 June).pdf Escrow Agreement (West) v3 - 26 June.pdf June 26 DRAFT SPA Disclosure Schedules - Clean copy.pdf redline).pdf	DH003429	DH003509
	Project Deco - Stock Purchase Agreement v8 (Flowroute 26 June).pdf	DH003510	DH003592
DH000911-912	NV PUC Letter and PN (7-13-18) - 4850-1842-7501.1-c1.pdf 7580.1-c1.pdf	DH003593	DH003673
DH000912-913	7580.1-c1.pdf	DH003674	DH003756
DH000914-915	Indemnification Claim Notice 11-19-20.pdf	DH003761	DH003842
DH000929	Project Deco - SPA Disclosure Schedules.pdf	DH003843	DH003924
	Redline_4811-2978-5195v2_Project Deco - SPA Disclosure Schedules - 4811- 2978-5195v4_Project Deco - SPA Disclosure Schedules.pdf	DH003925	DH003942
DH000930-931	Escrow Agreement (West) v3 - 26 June.pdf June 26 DRAFT SPA Disclosure Schedules - Clean copy.pdf redline).pdf	DH003943	DH003990
	Project Deco - Stock Purchase Agreement v8 (Flowroute 26 June).pdf	DH003991	DH004021
DH000934-935	Project Deco - SPA Disclosure Schedules.pdf Redline_4811-2978-5195v2_Project Deco - SPA Disclosure Schedules - 4811- 2978-5195v4_Project Deco - SPA Disclosure Schedules.pdf	DH004022	DH004105
		DH004113	DH004124
		DH004125	DH004127
		DH004131	DH004132
		DH004133	DH004145
		DH004146	DH004170
		DH004171	DH004196
		DH004206	DH004223
		DH004224	DH004271
		DH004272	DH004302
		DH004303	DH004386
		DH004396	DH004420
		DH004421	DH004446